

FILED

Jan 13, 2022

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

RAGHVENDRA SINGH BN-1097

(Name of Plaintiff)

KVSP, P.O. Box 5105

(Address of Plaintiff)
Delano, CA 93216

1:22-CV-00061-SAB (PC)

(Case Number)

vs.

COMPLAINT

SHUBHANGINI DEVINE

~~DOES 1-100~~

(Names of Defendants)

I. Previous Lawsuits:

A. Have you brought any other lawsuits while a prisoner: ☐ Yes ☒ No

B. If your answer to A is yes, how many?: _____ Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff _____

Defendants _____

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

Rev'd 5/99

2. Court (if Federal Court, give name of District; if State Court, give name of County) _____

3. Docket Number _____

4. Name of judge to whom case was assigned _____

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit _____

7. Approximate date of disposition _____

II. Exhaustion of Administrative Remedies.

A. Is there a grievance procedure available at your institution? ☐ Yes ☐ No

B. Have you filed a grievance concerning the facts relating to this complaint?
☐ Yes ☒ No

If your answer is no, explain why not I WAS NOT ALLOWED TO GRIEVE
THESE ISSUES.

C. Is the grievance process completed? N/A ☐ Yes ☐ No

III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item B for the names, positions and places of employment of any additional defendants.)

A. Defendant SHUBHANGINI DEVINE is employed as DOCTOR AT KERN
VALLEY STATE PRISON at DELANO, CA

B. Additional defendants _____

FROM: RAGHUVENDRA SINGH, CDCR # BNC097, P.O. BOX 15108, DELANO, CA 93312, KVS

REF: WHY WATCHDOGS STATE THAT CDCR AND ITS EMPLOYEES ARE SERIAL KILLERS

WATCHDOGS

IN "IN RE VAN STAICH (2020) 56 CA5TH 53", THE COURT RULED THE FOLLOWING:

THE DOCTORS, LAWS AND COURTS WANT TO HAVE MANDATORY SAFE SOCIAL DISTANCE BETWEEN INMATES AND TO PLACE INMATES HAVING POOR HEALTH IN TRANSITIONAL HOUSING OR OTHER HOUSING OUTSIDE PRISONS. NOT FOLLOWING LAWS OR DOCTORS' ADVICE IS DELIBERATE INDIFFERENCE.

AS CDCR AND ITS EMPLOYEES DID NOT FOLLOW MANDATORY SAFE SOCIAL DISTANCE AND THIS RULING, RESULTING IN MANY DEATHS DUE TO COVID-19, WATCHDOGS STATED THAT CDCR AND ITS EMPLOYEES KILLED MANY INMATES AND THUS, THEY ARE SERIAL KILLERS. CONSIDERING THIS RULING, CDCR DECIDED TO RELEASE 76,000 INMATES. THUS, OUR ISSUES ARE RELATED TO RELEASE OF 76,000 INMATES. DUE TO POOR IMMUNE SYSTEM, I GOT COVID-19, TUBERCULOSIS AND OTHER DISEASES MANY TIMES. SO, I SHOULD NOT BE IN A PRISONS.

REHABILITATION CAN TAKE PLACE OUTSIDE PRISONS AS GOVERNOR WANTS. PRISONS DO NOT PROVIDE SPECIALISTS, EMERGENCY SERVICE, BRACES FOR ME, DENTURES FOR ME, WHEELCHAIR AND CRUCHES FOR ME, BREATHING MACHINE FOR ME, AND TREATMENT TO MY BREATHING PROBLEM, CANCER, NERVE AND INSTABILITY PROBLEM AND OTHER PROBLEMS I HAVE. DUE TO COVID-19, PRISONS SHUT DOWN MANY SERVICES MAKING THEM HORRIBLE PLACES FOR INMATES LIKE ME HAVING POOR HEALTH. CDCR IS LIABLE FOR NOT PROVIDING ALL SERVICES AND ALL NECESSARY NEEDS OF INMATES.

COURTS ALSO STATED THE SAME.

THE COURTS "MUST NOT SHRINK FROM THEIR OBLIGATION TO ENFORCE THE CONSTITUTIONAL RIGHTS OF ALL PERSONS, INCLUDING PRISONERS" (BROWN V. PLATA (2011) 563 U.S. 493, 511). IT IS ALWAYS IN THE PUBLIC INTEREST TO PREVENT THE VIOLATION OF A PARTIES PARTY'S CONSTITUTIONAL RIGHTS (MELENDRES V. ARPAIO (9TH CIR. 2012) 695 F.3d 990, 1002). PUBLIC INTEREST CONCERNS ARE IMPLICATED WHEN A CONSTITUTIONAL RIGHT HAS BEEN VIOLATED, BECAUSE ALL CITIZENS HAVE A STAKE IN UPHOLDING THE CONSTITUTION (PREMINGER V. PRINCIPI (9TH CIR. 2005) 422 F.3d 815, 826). EMOTIONAL INJURIES, PSYCHOLOGICAL DISTRESS AND RISK OF SUICIDE CONSTITUTE IRREPARABLE HARM (EDMO V. CORIZON, INC. (9TH CIR. 2019) 935 F.3d 757, 798). IRREPARABLE PHYSICAL AND EMOTIONAL INJURIES AND THE VIOLATION OF CIVIL RIGHTS ARE IRREPARABLE HARMS (THOMAS V. CITY OF LOS ANGELES (9TH CIR. 1992) 978 F.2d 504, 511). MY CIVIL RIGHTS WERE VIOLATED, AND I SUFFERED IRREPARABLE PHYSICAL AND EMOTIONAL INJURIES. PRISON OFFICIALS AND COVID-19 MAINLY CAUSED SUCH INJURIES. PRISONS ARE LIABLE BUT ARE UNABLE TO PROVIDE CARE AND MEDICINES I NEED BECAUSE OF MANY REASONS. (SEE ABOVE SOME REASONS). FURTHER, TOO MANY MEDICINES MEANS KIDNEY FAILURE TOO. FACING COVID-19 IS LIKE FACING DEATH PENALTY. COVID-19 IS NEW AND DEADLY. SO, REGULAR DOCTORS DO NOT KNOW HOW TO TREAT ME. SO, DOCTORS WANT MY URGENT RELEASE FOR MY SURVIVAL BY TREATMENT AT SACRAMENTO CAMPUS OF UNIVERSITY OF CALIFORNIA. SO, PLEASE RELEASE ME FOR MY SURVIVAL. NO ONE ELSE SURVIVED AFTER GETTING COVID-19 TWICE.

WATCHDOGS CONSIDER MY CASE AS "BIGGEST CONSPIRACY OF THE CENTURY BY PROSECUTORS" BECAUSE MY ALMOST EVERY RIGHT WAS VIOLATED. FOR EXAMPLE, BEFORE TRIAL, PROSECUTOR TOOK MY EVIDENCE, DOCUMENTS AND INFORMATION ABOUT WITNESSES FROM MY JAILCELL MAKING ME DEFENSELESS. THUS, I WAS UNABLE TO PRODUCE EVIDENCE, DOCUMENTS AND WITNESSES TO PROVE THAT CHARGES AGAINST ME ARE FALSE AND FABRICATED. I WAS CONVICTED BASED ON FALSE AND FABRICATED TESTIMONIES ONLY WITHOUT ANY EVIDENCE.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

SHE DOES NOT CARE ABOUT COVID-19 AND SERIOUS DISEASES → DEFENDANT IS AN EXPERT IN TAKING PERSONAL PROPERTIES OF OTHERS WITHOUT ANY DUE PROCESS AND WITHOUT ANY WARNING, ON 11/18/21, SHE TOOK MY PERSONALLY OWNED CRUCHES CAUSING A LOT OF PAIN AND SUFFERING. SHE REFUSES TO GO IN ~~DETA~~ DETAIL. SHE DOES NOT CARE ABOUT COVID-19 AND SERIOUS DISEASES. SHE CONSPIRED WITH PRISON OFFICIALS FOR MY SUFFERINGS. SHE KNOWINGLY REFUSED TO FOLLOW HER LEGAL AND ETHICAL DUTIES TO RELEASE ME OR TO PLACE ME IN TRANSITIONAL HOUSING. SHE REFUSED TO PROVIDE ME MEDICINES FOR MY SKIN DISEASE AND OTHER DISEASES. SHE REFUSED TO REFER ME V. Relief. TO OTHER DOCTORS.

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

PLAINTIFF REQUESTS FOR HIS RELEASE FOR HIS SURVIVAL BY OUTSIDE TREATMENT AND FOR DAMAGES: \$10,000,000 OR MORE. IN "IN RE VAN STAICH (2020) 56 CA5TH 53", THE COURT RULED THAT INMATES LIKE ME HAVING POOR HEALTH SHOULD BE PLACED IN TRANSITIONAL HOUSING IF RELEASE IS NOT POSSIBLE. SO, PLEASE PLACE ME IN TRANSITIONAL HOUSING IF MY RELEASE IS NOT POSSIBLE. I GOT COVID-19 AND TUBERCULOSIS MANY TIMES. SO, I WILL DIE SOON IF I AM NOT TREATED AT SACRAMENTO CAMPUS OF UNIVERSITY OF CALIFORNIA. SO, PLEASE ~~HE~~ HELP ME A.S.A.P.

Signed this 30TH day of NOVEMBER, 2021.

RAGHVENDRA SINGH

(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

11/30/21
(Date)

RAGHVENDRA SINGH

(Signature of Plaintiff)